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December 21, 2015

VIA ECF & FEDERAL EXPRESS

The Honorable Robert W. Sweet Daniel Patrick Moynihan United States Courthouse 500 Pearl St., Room 1920 New York, NY 10007-1312 (212) 805-0254

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Re: Securities and Exchange Commission v. Luo, 1:15-cv-4867-RWS

Joint Request for an Order Extending Time to Respond to Complaint

Dear Judge Sweet:

The Securities and Exchange Commission ("SEC") and Haijian Luo respectfully request that the Court enter an order extending the current deadline to respond to the complaint in this matter from January 20, 2016 to February 22, 2016. The parties have conferred as to Mr. Luo seeking dismissal of the current complaint under Fed. R. Civ. P. 12(b)(6) and 9(b). The parties agree that, in the interest of judicial economy, an extension of the current deadline would be appropriate to allow the parties to continue their on-going efforts to negotiate a resolution to this matter without the need for further litigation and have stipulated and agreed to the requested extension of time to respond to the complaint. Three prior extensions have been granted.

Respectfully submitted,

By: /s/Gabriel Colwell_

Gabriel Colwell (pro hac vice) Counsel for Defendant Squire Patton Boggs (US) LLP 555 S. Flower Street, Suite 3100 Los Angeles, California 90071 (213) 689-5126 Gabriel.colwell@squirepb.com

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VIA ECF & FIRST CLASS MAIL

The Honorable Robert W. Sweet December 17, 2015

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By: /s/ Todd D. Brody

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